

Rent Increase Application Hearing

La Hacienda Mobile Estates

November 14, 2023

Presented by: Sarah Papazian, Senior Deputy City Attorney, Code Enforcement

Two Main Categories of Rent Increases Under FMC 12-2000 et. seq

FMC § 12-2014 Automatic

- 75% of the Consumer Price Index (published by US Bureau of Labor Statistics)
- Not subject to approval by Park's residents or City Commission
- For 2023, the permitted amount was 6.6% (75% of 8.8%)

FMC § 12-2009 Non-Automatic

- Anything above the automatic amount authorized by City Council under FMC § § 12-2013 & 12-2014 must be approved by vote of Park residents.
- If Park residents don't approve,
 Owner may bring the application to
 Commission for review

NOTE: FMC § 12-2013 provides another type of automatic increase (Pass-through of annual government costs), but it is not a factor in La Hacienda's application



"Just, Fair, and Reasonable" Amount

- FMC § 12-2012 lists eleven potentially relevant factors for what is just, fair, and reasonable
- For non-automatic rent increases, Owners are to identify which factor(s) support their application and submit supporting documentation for those factors (FMC §12-2009(b).)
- The Commission is charged with reviewing the documentation and holding a hearing, then approving an amount that the Commission determines to be just, fair, and reasonable.

La Hacienda's Application

- ► La Hacienda asserts the average base rent is \$377.58
- La Hacienda seeks the following rent increases, for a total increase of \$350.00
 - > \$24.92, based on the FMC § 12-2014 automatic CPI increase of 6.6%
 - \$325.08, based on the nonautomatic rent increase factors of FMC § 12-2012
- \$350 would be a 93% increase of the average rent



Mobilehome Park Rent Review and Stabilization Ordinance

Automatic and Non-Automatic Rent Increase Application Summary of Relevant Factors

Mob	ileh	ome Park:	La Hacienda Mobile	Estate	es		
	-		Name				
	_		104 E. Sierra Ave.,	Fresn	o, C	A 93710	
			Address				
Α.	Auto	omatic Incre	ease – Consumer Pr	ice In	dex (FMC Chapter 12, A	rticle 20, §12-2014)
	1.		ge in the previous year's C n November 1 and Octob		er Pri	ce Index (CPI) for the	8.8% x 75% = 6.6%
	2.		average rents of all affect preceding the rent increase			om December 1 of the	\$377.58
	3.	Total dollar an	nount of the increase base	ed upor	the (CPI.	\$24.92
	Auto 2013		s-Through of Annual	Gove	ernm	ent Costs (FMC Ch	apter 12, Article 20, (§12-
	1.	Government n	nandated costs, 12 month	s prior	to dat	e of application.	
	2.	Government n	nandated costs effective of	n the d	late of	application.	
	3.	Percentage in	crease over a 12-month p	eriod.			
	4.	Percentage ar	mount which exceeds 5 pe	ercent.			
	5	Total dollar an	nount of the increase base	ed on th	ne ann	nual government	
		cost increases					
			D				000 4 040 0040)
C	Non	-Automatic	Rent Increase (FMC	Cnap	oter	12, Article 20, §12-2	009 and §12-2012)
descri factor	ibed i to th	n §12-2012 (a-k) in determining the amount of	of the in	crease	. Review §12-2012 (a-k) an	Commission will consider the factors of mark the box next to each relevant umentation for each relevant factor is
;	а.	Percentage ch	ange in the CPI.	_	g.	Changes in reasonable of	perating and
	b.	State/federal v	vage and price guidelines.			maintenance expenses.	
X (D.	Comparable n	nobilehome spaces in	_	h.	Repairs other than wear	and tear.
		comparable pa	arks. Exhibit A	_	i.	The amount of services a	and amenities.
	d.	The length of t	time since the last increase.	_	j.	Any existing lease.	
Х ,	е.	Completion of	any capital improvements	X	k.	A just and reasonable ra	te of return on
		or rehabilitatio	n work. Exhibit B			the owner's investment.	Exhibit C
f		Changes in re	nt paid by the owner for				
		lease of the la	nd.				
Total	Ame	ount Request	ed for Non-Automatic Re	ent Inc	rease	Application \$325.	08

D. Total Requested Rent Increase Amount (Automatic and Non-Automatic)

La Hacienda's Application

- In the La Hacienda Rent Increase Application, Owner identified three relevant factors from FMC § 12-2012:
 - (c) Rent lawfully charged for comparable mobilehome spaces in comparable mobilehome parks (Application Exhibit A)
 - (e) The completion of any capital improvements or rehabilitation work related to or benefiting the mobilehome spaces specified in the rent increase application (Application Exhibit B)
 - (k) A just and reasonable rate of return on the owner's investment in the mobilehome park (Application Exhibit C)
 - "A just and reasonable rate of return shall be one high enough to encourage good management, reward efficiency, discourage flight of capital from the mobilehome park and enable the owner to maintain its credit, shall be commensurate with returns in enterprises comparable to the subject mobilehome park, but shall not be so high as to defeat the purpose of this article to protect residents against excessive rent increases"

Exhibit A: Comparable Mobilehome Spaces in Comparable Parks

COMPARABLE RENTS									
Park		Average Rent	Year		Inflation Adjusted		La Hacienda - Adjustment for Included Trash and Water	Total Adjusted F	Rent
San Joaquin Estates	\$	372.06	2022	\$	395.78	\$	63.22	\$ 45	9.00
Sunset West Community	\$	311.00	2011	\$	408.52	\$	63.22	\$ 47	1.74
Town & Country	\$	364.94	2017	\$	440.76	\$	63.22	\$ 50	3.98
Sierra Mobile Park	\$	377.95	2014	\$	472.04	\$	63.22	\$ 53	35.26
Franciscan	\$	391.49	2017	\$	472.83	\$	63.22	\$ 53	6.05
Woodword Bluffs	\$	426.52	2021	\$	480.47	\$	63.22	\$ 54	3.69
Three Palms	\$	432.59	2021	\$	482.60	\$	63.22	\$ 54	5.82
Sunnyside	\$	430.07	2021	\$	484.47	\$	63.22	\$ 54	7.69
Villa Capri	\$	464.64	2022	\$	494.26	\$	63.22	\$ 55	7.48
Millbrook	\$	411.86	2017	\$	497.43	\$	63.22	\$ 56	0.65
Alhambra II	\$	446.85	2019	\$	513.56	\$	63.22	\$ 57	6.78
Four Seasons	\$	503.22	2021	\$	566.87	\$	63.22	\$ 63	0.09
Fresno Mobile Estates	\$	507.53	2021	\$	571.72	\$	63.22	\$ 63	4.94
Westwinds	\$	595.00	2023	\$	595.00	\$	63.22	\$ 65	8.22
San Joaquin Village	\$	562.84	2018	\$	664.82	\$	63.22	\$ 72	28.04
The Willows of Santiago	\$	545.16	2020	\$	614.11	\$	63.22	\$ 67	77.33
Shady Lakes	\$	630.38	2023	\$	630.38	\$	63.22	\$ 69	3.60
Westlake Park	\$	579.01	2021	\$	645.95	\$	63.22	\$ 70	9.17
Country Living	\$	582.73	2021	\$	656.44	\$	63.22	\$ 71	9.66

Average of Comparable Rents: \$ 594.17

Exhibit A, Attachment 1: Supporting documentation for the above comparable rent analysis.

Park	Inflation	Amenities at Park	Utilities Included in
	Adjusted		Rent
	Rent per App.		
San Joaquin Estates	\$395.78	Off-street Parking, Clubhouse, Swimming Pool	Water, but not trash
Sunset West	\$408.52	Clubhouse, Swimming Pool, Laundry Facilities, Showers, Restrooms, RV pull through spaces	Unknown
Town & Country	\$440.76	Clubhouse, Playground, Swimming Pools, Laundry Facilities	Water, but not trash
Sierra Mobile Park	\$472.04	Off-street Parking	Both trash & water
Franciscan	\$472.83	Off-street Parking, Clubhouse, Playground, Swimming Pools, Laundry Facilities	Trash, but not water
Woodward Bluffs	\$480.47	Off-street Parking, Playground, Clubhouse, Swimming Pool, Spa, Shuffleboard Court, Billiards Room, Library, Laundry	Both trash & water
		Facilities, Fitness Center, Boat & RV Storage	
Three Palms	\$482.60	Off-Street Parking, Swimming Pool, Laundry Facilities, Showers, Restrooms	Neither
Sunnyside (now	\$484.47	Off-street Parking, Clubhouse, Swimming Pool, Laundry Facilities	Both trash & water
Ashwood Place)			
Villa Capri	\$494.26	Off-street Parking, Swimming Pool, Spa	Both trash & water
Millbrook	\$497.43	Swimming Pool, Laundry Facilities	Neither
Alhambra II	\$513.56	Off-Street Parking, Swimming Pool, Laundry Facilities	Neither
Four Seasons	\$566.87	Gated, Off-Street Parking, Playground, Clubhouse, Swimming Pool, Basketball Court, Billiards Room, Laundry Facilities,	Water, but not trash
		Fitness Center, Game Room, Library, Boat & RV Storage	
Fresno Mobile Estates	\$571.72	Gated Swimming Pool, Laundry Facilities	Neither
Westwinds**	\$595.00	None	Unknown
San Joaquin Village	\$664.82	Off-street Parking, Playground, Clubhouse, Swimming Pool, Spa, Laundry Facilities, Library, Billiards Room, RV Storage	Neither
Willows of Santiago	\$614.11	Playground, Clubhouse, Spa, Swimming Pool, Basketball Court, Billiards Room, Library, Fitness Center	Neither
Shady Lakes**	\$630.38	None	Unknown
Westlake Park	\$645.95	Off-street Parking, Clubhouse, Swimming Pool	Unknown
Country Living	\$656.44	Gated, Clubhouse, Swimming Pool, Spa, Billiards Room, Laundry Facilities, Library, Boat & RV Storage	Both trash & water
**This park is not loop	tod within the Ci	ty of Freene, and is also owned by Harmony	

^{**}This park is not located within the City of Fresno, and is also owned by Harmony

Park	Inflation Adjusted Rent per App.	Amenities at Park	Utilities Included in Rent
San Joaquin Estates	\$395.78	Off-street Parking, Clubhouse, Swimming Pool	Water, but <u>not</u> trash
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Three Palms	\$482.60	Off-Street Parking, Swimming Pool, Laundry Facilities, Showers, Restrooms	Neither
Sunnyside (now Ashwood Place)	\$484.47	Off-street Parking, Clubhouse, Swimming Pool, Laundry Facilities	Both trash & water
Villa Capri	\$494.26	Off-street Parking, Swimming Pool, Spa	Both trash & water
Millbrook	\$497.43	Swimming Pool, Laundry Facilities	Neither
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^{**}This park is not located within the City of Fresno, and is also owned by Harmony

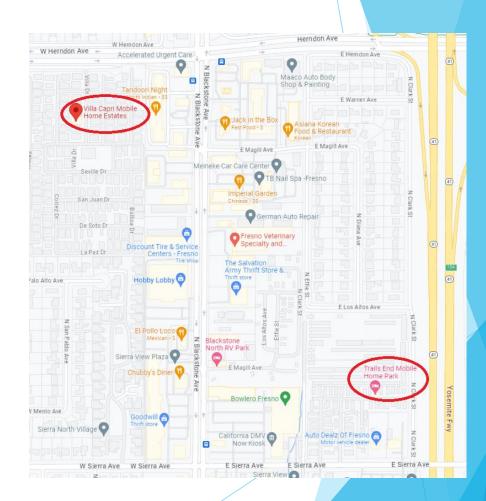


Exhibit B: Completion of Any Capital Improvements or Rehabilitation Work

CITY-MANDATED REHABILITATION COSTS							
	Invoice Total:	\$402,223.54					
	Number of Spaces:	60					
	Rehabilitation Cost Per Space:	\$6,703.73					
	Per Space (Monthly):	\$558.64					
	· · · · · · · · · · · · · · · · · · ·						
Exhibit B, Attachment 1:	Court documents from the City of Fresno's PETITION FOR ORDER TO ABATE SUBSTANDARD BUILDING, APPOINTMENT OF RECEIVER, AND ORDERS PURSUANT TO CALIFORNIA HEALTH AND SAFETY CODE (Fresno County Superior Court Case No. 21CECG02816).						
	·						
Exhibit B, Attachment 2:	Invoices for the rehabilitation work mandated by the City of Fresno and the Fresno County Superior Court through its receiver California Receivorship Group, Inc. appointed pursuant Health and Safety Code sections 1804(b) and 17980.7(c), and Code of Civil Procedure section 564 et seq.						

door-to-door to introduce themselves, and then finish the repairs as necessary. The vast majority of these issues are relatively minor simple to correct, like disposing of the accumulated garbage or removing an exterior appliance. If a permit is required to complete the work, the Buyer will pull that permit before commencing with the repairs. For the types of repairs required here, the permitting process will be handled by the City of Fresno, and not HCD. The Receiver, the City, and the Park owners discussed this process in a recent conference call, and the City's permitting system and process is streamlined and straightforward, which will help expedite the repairs.

The Buyer has agreed to incur these repairs costs, up to \$300,000, which will then be credited towards the purchase price at closing. In the event that the repair costs exceed \$300,000, the Buyer can either come out of pocket to complete the repairs, or cancel the sale. In the event that the sale does not close, the Receiver will then pay for the Buyer's repair costs, either through the proceeds of another sale, or from the receivership account. Again, it is worth emphasizing that both the Park owners and the Buyer want to close this sale, and so this is unlikely to occur. And to highlight the cooperative nature of this receivership, the Receiver has not needed to request, let alone fund, a Receiver's Certificate as the Park owners have paid the receivership costs throughout this matter. This contingency is highlighted here in the unlikely event the sale does not proceed.

This process is already underway, and will likely accelerate in the next month. The
Receiver, the Park owners, the Buyer, and the City all have a role to play, and the Receiver
expects all parties to continue along the spirit of cooperation that has been central to this matter

after the date of execution of this Amendment by both Buyer and Seller, or (ii) thirty (30) days after the date that Seller delivers to Buyer the Deliverables set forth in Paragraph 28 of the Agreement. Buyer shall have complete access to the Property, Seller's books and records related to the Property, and the Deliverables from the Date of Agreement until the date of Closing.

- 3. <u>Cure of Health Code Violations</u>. Buyer agrees to incur up to Three Hundred Thousand and No/100 Dollars (\$300,000.00) in Buyer's Costs (as defined in Section 6 below), or such greater amount as Buyer may elect to incur to cure the Health Code Violations (collectively, "Buyer's Work"), subject to the terms and conditions of this Amendment. If Buyer determines that Buyer's Work will cost more than \$300,000.00 to cure, then Buyer may elect to terminate this Agreement or agree to pay the excess in addition to the Purchase Price.
- Buyer's Closing Conditions. Notwithstanding anything to the contrary contained in the Agreement, in addition to the Buyer's Contingencies set forth in the Agreement, Closing shall be contingent upon the following:
- (a) Seller having executed and delivered to Escrow the Deed, bill of sale, an estimated settlement statement, and all other documents as may be reasonably required by Buyer or Escrow to allow Closing to occur.
 - (b) The Receiver having satisfied the requirements of Section 11 herein.
- (c) The Court having issued an order (i) dismissing the Case, (ii) authorizing the Closing, (iii) dismissing Receiver as the appointed receiver for the Property upon Closing, and (iv) finding that all Health Code Violations have been cured and no further violations of the Health Code exist.
- (d) The City of Fresno reinstating the Permit to Operate the Property as a mobile home park.

Runer shall have the right to terminate this Agreement if Runer's closing



6653 Embarcadero Dr., Suite C Stockton, CA 95219

Invoice

Date	Invoice #
05/20/2022	PR05/02-15/22

Bill To

La Hacienda MHC

		P.O. No.	Terms	Project
		PRREIMB		
Quantity	Description		Rate	Amount
1	PR 05/02/22-05/15/22, Gross, Taxes, WC, Fees		\$31.70	\$31.70
			Total	\$31.70



6653 Embarcadero Dr, Suite C Stockton, CA 95219

Invoice

Date	Invoice #
05/20/2022	PR05/02-15/22

Bill To

La Hacienda MHC

		P.O. No.	Terms	Project
		PRREIMB		
Quantity	Description	1	Rate	Amount
1	PR 05/02/22-05/15/22, Gross, Taxes, WC, Fees		\$1,082.05	\$1,082.05
			Total	\$1,082.05



6653 Embarcadero Dr, Suite C Stockton, CA 95219

Invoice

Date	Invoice #
05/20/2022	PR05/02-15/22

Bill To

La Hacienda MHC

		P.O. No.	Terms	Project
		PRREIMB		
Quantity	Description		Rate	Amount
1	PR 05/02/22-05/15/22, Gross, Taxes, WC, Fees		\$1,123.95	\$1,123.95
			Total	\$1,123.95



6653 Embarcadero Dr, Suite C Stockton, CA 95219

Invoice

Date	Invoice #
05/20/2022	PR05/02-15/22

Bill To

La Hacienda MHC

		P.O. No.	Terms	Project
		PRREIMB		
Quantity	Description		Rate	Amount
1	PR 05/02/22-05/15/22, Gross, Taxes, WC, Fees		\$6,936.75	\$6,936.75
	<			
			Total	\$6,936.75

6 7	Attorneys for Defendants Joan Kevorkian, and George L. Wallet and Sara J. Wallet as Co- Trustees of the Bypass Trust Created Under the Corrine M. Wallet Separate Property Trust										
8	SUPERIOR COURT OF CALIFORNIA										
9	COUNTY OF FRESNO										
10											
11	CITY OF FRESNO, a municipal corporation, PEOPLE OF THE STATE OF CALIFORNIA	Case No. 21CECG02816									
12	Petitioner,	DECLARATION OF JOHN H. FROST IN SUPPORT OF RESPONDENTS'									
13 14	vs.	OPPOSITION TO CITY OF FRESNO'S PETITION FOR APPOINTMENT OF A RECEIVER									
15	JOAN KEVORKIAN, and GEORGE L. WALLET and SARA J. WALLET as CO-TRUSTEES of the	NOCETY EX									
16	BYPASS TRUST CREATED UNDER THE CORRINE M. WALLET SEPARATE PROPERTY	Hearing Date: November 10, 2021 Time: 3:30 p.m.									
17	TRUST, and DOES 1 THROUGH 50, inclusive	Dept.: 402									
18	Respondents.	Date Action Filed: September 24, 2021									
19											
20	I, John H. Frost, state under penalty of perjur	y;									
21	I am over the age of 18 and an archite	ct licensed by the State of California (C8868).									
22	My office is located in Fresno, California.										
23	Except for those matters stated on information and belief, I have personal knowledge										
24	of the facts contained herein, and if called upon as a witness, I could testify competently thereto.										
25	With respect to those matters stated on information and belief, I believe them to be true and could										
26	testify competently thereto.										
27	3. This Declaration is filed in support of Respondents' Opposition to the City of										
28	Fresno's Petition for Appointment of a Receiver. For the Court's convenience, I have divided this										



4075 Celeste Ave Clovis, CA 93619 Don Jimenez: 559-313-7179 Office: 559-291-0711 Fax: 559-346-1227 donjimenez@rocketmail.com

License# 948614







Name-Address

Attn: John Frost Trails End Mobile Home Park 1207 W Fremont Ave Fresno, CA 93711

DESCRIPTION	Amount	
Project Location:		
Trails End MHP		
Phase 1 OK Meskern Klive + 25% 4- East/Mest Kinix		
Asphalt - Approx size 16,619 S.F.		
- Overlay with 1.5" of HMA	\$33,238.00	
- Compact and roll to a smooth finish		
-Layout and stripe firelane	\$1,500.00	
1.) Paint "No Berking-five Lane" as per affected Grawing - Lost TBD		
Approved to Proceed by : John H. Frost, AIA Agent	10 5 2021 For George San	hi fiau
TOTAL	\$34,738.00	

Description	Amount
Amount claimed by Owner in Application	\$402,223.54
\$300,000.00 credit through Receivership close of escrow subtracted	\$102,223.54
\$14,735.93 of duplicate charges subtracted	\$87,487.61
\$34,738.00 for repaying not paid by Owner subtracted	\$52,749.61

For duplicate charges, the charge of greatest value was retained and all other charges of lesser value subtracted

Exhibit C: A Just and Reasonable Rate of Return on the Owner's Investment

JUST AND REASONABLE RATE OF RETURN ON THE OWNER'S INVESTMENT													
Purchase Price	П	\$1,700,000		\$1,700,000		\$1,700,000	Г	\$1,700,000		\$1,700,000	\$1,700,000		\$1,700,000
Monthly Rent		\$575		\$600		\$625		\$650		\$675	\$700		\$725
Rental Spaces		60		60		60		60		60	60		60
Vacancy Rate		50%		50%		50%		50%		50%	50%		50%
Monthly Rent		17,250		18,000		18,750		19,500		20,250	21,000		21,750
Annual Income		\$207,000		\$216,000		\$225,000		\$234,000		\$243,000	\$252,000		\$261,000
Expenses	\vdash												
Taxes	\$	15,665.00	\$	15,665.00	\$	15,665.00	\$	15,665.00	\$	15,665.00	\$ 15,665.00	\$	15,665.00
Offsite Management	\$	14,400.00	\$	14,400.00	\$	14,400.00	\$	14,400.00	\$	14,400.00	\$ 14,400.00	\$	14,400.00
Insurance	\$	12,741.20	\$	12,741.20	\$	12,741.20	\$	12,741.20	\$	12,741.20	\$ 12,741.20	\$	12,741.20
Repairs and Maintenance	\$	18,000.00	\$	18,000.00	\$	18,000.00	\$	18,000.00	\$	18,000.00	\$ 18,000.00	\$	18,000.00
Garbage	\$	13,524.00	\$	13,524.00	\$	13,524.00	\$	13,524.00	\$	13,524.00	\$ 13,524.00	\$	13,524.00
Water/Sewer	\$	26,748.00	\$	26,748.00	\$	26,748.00	\$	26,748.00	\$	26,748.00	\$ 26,748.00	\$	26,748.00
Gas and Electric	\$	800.00	\$	800.00	\$	800.00	\$	800.00	\$	800.00	\$ 800.00	\$	800.00
Permits	\$	5,670.00	\$	5,670.00	\$	5,670.00	\$	5,670.00	\$	5,670.00	\$ 5,670.00	\$	5,670.00
Onsite Management	\$	27,716.00	\$	27,716.00	\$	27,716.00	\$	27,716.00	\$	27,716.00	\$ 27,716.00	\$	27,716.00
Legal	\$	19,048.00	\$	19,048.00	\$	19,048.00	\$	19,048.00	\$	19,048.00	\$ 19,048.00	\$	19,048.00
General and Administrative	\$	5,000.00	\$	5,000.00	\$	5,000.00	\$	5,000.00	\$	5,000.00	\$ 5,000.00	\$	5,000.00
Interest	\$	57,205.32	\$	57,205.32	\$	57,205.32	\$	57,205.32	\$	57,205.32	\$ 57,205.32	\$	57,205.32
Amortization	\$	1,090.00	\$	1,090.00	\$	1,090.00	\$	1,090.00	\$	1,090.00	\$ 1,090.00	\$	1,090.00
Total Expense	\$	217,607.52	\$	217,607.52	\$	217,607.52	\$	217,607.52	\$	217,607.52	\$ 217,607.52	\$	217,607.52
NOI	\$	(10,607.52)	\$	(1,607.52)	\$	7,392.48	\$	16,392.48	\$	25,392.48	\$ 34,392.48	\$	43,392.48
Rate of Return		-0.62%		-0.09%	L	0.43%	L	0.96%	L	1.49%	2.02%	L	2.55%

Exhibit C, Attachment 1: Supporting documentation for the above just and reasonable return on the owner's investment analysis.

Residents Allege Inaccuracies in Application Form MRR 1-3

- Opposition submitted by Residents assert two types of inaccuracies in Form MRR 1-3 (pages 3-9): (1) inaccurate occupancy information; and (2) inaccurate space rent information
- Occupancy: Residents assert eight units marked vacant on Form 1-3 were occupied in May 2023 when Application was submitted: Spaces 12, 10D, 15A, 20, 31, 41, and 48
 - Exhibit 4 contains resident profiles for Spaces 41 and 48 (pages 111 and 121 of the Opposition Report)
 - Fresno County Superior Court case numbers are provided for Spaces 20 and 34
 - No supporting documentation is provided for Spaces 12, 10D, 15A, or 31

Residents Allege Inaccuracies in Application Form MRR 1-3

- Space Rent: Residents assert twenty-five of the units listed in Application Form 1-3 with a space rent of \$495 actually have a space rent of \$300. Residents submitted the following documents in support of that assertion:
 - Fresno County Superior Court Case No. 23CECL00335 Amended Complaint, where Owner's attorney does state that the space rent for all spaces in the park is \$300 per month
 - Fresno County Superior Court Case No. 23CECG01440 Declaration, where resident of Space 34 (marked as paying \$495 per month on Form 1-3) states that her space rent is \$300 per month
 - Fifteen Declarations submitted by residents to Fresno City Council as part of a separate report. Of the fifteen, eleven state their monthly space rent is \$300 (Spaces 29C, 41, 26, 38, 1, 30, 29A, 5, 4, 43, and 48), three do not state what their monthly space rent is (Spaces 15C, 10F, and 32), and one declaration contradictorily stating the space rent is \$386 per month
- Note: The average base rent is what is used to calculate the 6.6% automatic CPI increase. If the average rent is \$300 as Residents claim, not \$377.58 as Owner claims, the automatic increase amount would be \$19.80, not \$24.92.

Quantitative Summary

		On Application	Staff Assessment
Exhibit A	Comparable Rent	\$ 594.17	\$ 472.04 - 494.26
(Page 13)			
Exhibit B	Costs of Rehabilitation	\$ 402,223.54	\$ 52,749.61
(Page 312)	Number of Spaces	60	60
	Rehab Cost Per Space	\$ 6,703.73	\$ 879.16
	Cost Per Space	\$ 558.64	\$ 73.26
	Average Rent + Cost Per Space (If Avg. is \$377.58)	\$ 936.22	\$ 450.84
	Average Rent + Cost Per Space (If Avg. is \$300)	\$ 886.22	\$ 373.26
Exhibit C (Page 985)	Various Expenses	\$ 217,607.52	Unsubstantiated; cannot analyze



QUESTIONS?